To: Flanagan, Sarah[Flanagan.Sarah@epa.gov]
Cc: Arnold, Adam C.[AArnold@gibbonslaw.com]
From: Hatfield, William S.
Sent: Fri 5/6/2016 7:12:49 PM
Subject: RE: Diamond Alkali - Dioxin Investigation
2378-TCDF 02OCT08.pdf
LPR - Givaudan - Source Investigation Presentation (May 2016).pdf

Hi Sarah:

As requested, Givaudan provides the following information in response to EPA's questions below.

1. How were the co-eluted furans handled?

** **The lab advised that it met the 40% valley resolution for the 2,3,7,8-TCDF and close-eluting furans. The quantification and reporting were performed per Method 1613B and were successfully validated at Level IV per EPA Region II Validation SOP HW-25 (revision 3, September 2006). See attached information provided by the lab.**

2. How were the non-detect samples handled?

** **Congeners reported as non-detect (ND) in the samples were assigned a value of zero for generating histograms so that the relative distributions are not distorted by detection limits.**

3. Are we correct in thinking that two chemicals (2,3,4,6,7,8-HxCDF and 1,2,3,7,8,9-HxCDF) are switched on different plots? For example, on page 12 the pink line that represents "Clifton Containment Cell (n=20)" has a little peak at 1,2,3,7,8,9-HxCDF, but on slide 8, that peak corresponds to 2,3,4,6,7,8-HxCDF, not 1,2,3,7,8,9-HxCDF.

** **See attached updated slide deck, dated 4/20/16. The x-axis labeling in Slides 4, 9, 12, and 13 was corrected for 2,3,4,6,7,8-HxCDF and 1,2,3,7,8,9-HxCDF, which results in only very minor changes to the data presentation. The data interpretation and peak patterns in all of the figures remain consistent because the concentrations of those two congeners were similar. In addition, slides 3 and 30 show the comparison of 2, 3, 7,8 – TCDD in the samples from the Clifton and Lister Containment Cells, which reflect Lister's exceedingly high dioxin levels.**

Please let us know if you have any other questions.

We thank you and all of EPA's team for their time and efforts on this matter.

Regards,

Bill

William S. Hatfield

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GIBBONS

From: Flanagan, Sarah [mailto:Flanagan.Sarah@epa.gov]
Sent: Monday, May 02, 2016 6:05 PM
To: Hatfield, William S.; Arnold, Adam C.
Subject: RE: Diamond Alkali - Dioxin Investigation

Bill and Adam – Just following up to see if you have a response to the questions below.

Thanks.

-Sarah

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From: Flanagan, Sarah
Sent: Monday, April 18, 2016 3:50 PM
To: William Hatfield <whatfield@gibbonslaw.com>; 'Arnold, Adam C.' <AArnold@gibbonslaw.com>
Subject: Diamond Alkali - Dioxin Investigation

Bill and Adam,

After looking at your data and presentation, EPA has several follow-up questions.

1. How were the co-eluted furans handled?

2. How were the non-detect samples handled?

3. Are we correct in thinking that two chemicals (2,3,4,6,7,8-HxCDF and 1,2,3,7,8,9-HxCDF) are switched on different plots? For example, on page 12 the pink line that represents "Clifton Containment Cell (n=20)" has a little peak at 1,2,3,7,8,9-HxCDF, but on slide 8, that peak corresponds to 2,3,4,6,7,8-HxCDF, not 1,2,3,7,8,9-HxCDF.

Finally, we also would like to confirm that, as discussed on March 10, 2016, the Clifton containment cell was resealed subsequent to the August 2015 sampling event, and that Givaudan has no concerns with EPA's post-sampling repairs to the containment cell as described in the report by Denis Newcomer, LSRP, of AMO Environmental Decisions, dated September 22, 2015.

Thanks

-Sarah

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